

EXHIBIT

E

AMERICAN UNIVERSITY OF ANITIGUA COLLEGE OF
MEDICINE v. WOODWARD

STEVEN L. WOODWARD

March 24, 2011

Prepared for you by



Bingham Farms/Southfield • Grand Rapids
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1 A. No, I don't. I mean, I retake that. I mean, I don't
2 know exact dates. That's my answer to my question. I
3 can't tell you the exact date, the exact year that I
4 worked for that particular company.

5 Q. What did you do at EDS?

6 A. I was a system administrator.

7 Q. What did that entail?

8 A. I worked for Sun Remote Services, which was -- we
9 monitored computers from around the world. Ours was
10 computers in North America -- I think we did some in
11 South America -- and I did applications, so we
12 installed these -- the software and maintained the
13 servers for Sun Remote Services.

14 Q. Where did you work before EDS?

15 A. I worked at Storage Tech.

16 Q. When was that?

17 A. That was -- I worked at Storage Tech from the early
18 '90s until 2001, and it was on and off. They have
19 layoffs. I worked for them with different headhunting
20 groups, I'd work for them, they'd have a layoff, I'd
21 get involved with a headhunting group get back
22 involved with them, work for them again, et
23 cetera.

24 Q. What did you do for Storage Tech?

25 A. I was an engineer. My visual exhibits show you what I

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1 was. My first was a manufacturing engineer for the
2 Powderhorn robot. You have exhibits in here
3 concerning that. It's one of the world's largest tape
4 library systems. In here is myself demonstrating this
5 to young engineers, of which you have a certificate of
6 thanks or appreciation for showing young engineers
7 high technology. I mean --

8 Q. So you were an engineer?

9 A. I was a manufacturing engineer. I worked in CAD
10 support, so I took care of the 3-D modeling systems
11 for over 100 -- somewhere probably close to 150
12 engineers. And it was -- again, it's a 3-dimensional
13 CAD system, computer-aided design system, and I did
14 the database part of that.

15 Q. Did you work anywhere prior to Storage Tech?

16 A. I worked in between Storage Tech and EDS with these
17 headhunting jobs, again being laid off. A friend of
18 mine and I tried to start -- it's actually his
19 business. I just helped him.

20 Q. Let me stop you here.

21 A. Well, you're asking me where I worked. You're asking
22 me a complete history. I'm trying to give you a
23 complete history.

24 Q. I'm asking you a question, where did you work before
25 Storage Tech? You've given me answers that were not

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1 before Storage Tech.

2 A. I'm trying to answer your question.

3 Q. Did you work anywhere before Storage Tech, that's the
4 question.

5 A. I worked --

6 Q. Were did you work prior to Storage Tech?

7 A. After college, of which I worked at Hammond Machinery
8 in Kalamazoo, Michigan as a robotics technician, I
9 left -- after I graduated with my manufacturing
10 engineering degree I went to Colorado, and the first
11 job that I had there was working for Coors.

12 Q. How old are you, Mr. Woodward?

13 A. 47.

14 Q. When did you graduate high school?

15 A. '82.

16 Q. When did you graduate college?

17 A. That's a broad statement.

18 Q. Bachelor's?

19 A. Okay. My --

20 Q. Your first college degree?

21 A. My first college degree was an associate's degree. I
22 graduated with a degree in robotics from Oakland
23 Community College with honors. I believe my GPA was
24 somewhere around 3.5, and that would have been in -- I
25 believe two and a half years after the Army, which

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1 would have put me -- '85, '86, '87, some extended
2 degree. I think it was the beginnings of '88, I
3 believe. I can look it up. I have this information
4 there if you need it.

5 Q. I don't want you to look it up. So you went to high
6 school and then you went to the Army before you
7 pursued higher education?

8 A. Correct.

9 Q. What years were you in the Army?

10 A. October of '82 to '85, three years.

11 Q. What did you study in the -- or what was your
12 profession in the Army?

13 A. I was a Vulcan cannon system mechanic. I believe the
14 MOS was 23 mike.

15 Q. Were you honorably discharged?

16 A. I was.

17 Q. And then following --

18 A. You have that information also.

19 Q. -- your discharge in 1985 did you immediately
20 matriculate to Oakland Community College?

21 A. I don't know about immediately, but it was definitely
22 within probably a month of being separated, somewhere
23 around -- I mean, when I got discharged in October or
24 whenever -- I think I had a terminal leave, so my
25 separation would have been in October, but I think I

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1 left early because of vacation that I had so I could
2 start college. So I saved my vacation to go to
3 college, I believe, because I started whatever that
4 fall semester would have been, August, September,
5 whatever that is, at Oakland Community College, so I
6 left the Army and went directly into my associate's
7 degree.

8 Q. Following your education at Oakland Community College
9 did you attend college somewhere else?

10 A. I went to Western Michigan University.

11 Q. What years were you there?

12 A. That would have been after my community college, I
13 mean, almost directly and so that would be around --
14 I'm going to guess -- again, I have the documentation
15 if you want to see it. I'm going to -- I believe it's
16 '88 to the end of '90 is when I think I went there.
17 It was a two-plus-two degree. I think you can
18 transfer with a maximum of 60 credits, but don't hold
19 me on that.

20 Q. What did you study at Western?

21 A. Manufacturing engineering.

22 Q. Did you graduate?

23 A. I did. That's the same time I worked at Hammond
24 Machinery, the same time I went to Western Michigan
25 University, so I worked and went to school there.

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1 Q. Hammond Machinery is in Kalamazoo?

2 A. Correct.

3 Q. Storage Tech, where is that?

4 A. Storage Tech is in Louisville -- it's not -- I don't
5 even know it's Storage Tech anymore because it was
6 sold from Storage Tech to Sun Microsystem, which was
7 bought out by I believe Oracle, so I don't even know
8 who these -- I don't even know who these companies are
9 anymore.

10 Q. When you worked for Storage Tech it was in Colorado?

11 A. It was in Colorado in Louisville.

12 Q. What about EDS, where was that?

13 A. EDS, its headquarters I believe is in Palo Alto, but
14 EDS is now owned by Hewlett Packard, so I'm not
15 sure --

16 Q. Where did you work for EDS?

17 A. Louisville, Colorado, and we were actually a
18 subcontractor, EDS, to Sun Microsystems which bought
19 Storage Tech, which is now bought by Oracle. I
20 believe that's how it is. I haven't followed it too
21 much. I've been trying to study medicine.

22 Q. What years were you at AUA?

23 A. I was at AUA -- the last semester would have been
24 December -- December of 2007, and the -- I think I
25 started January then of 2006, I believe. I'm not

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1 sure. Yeah, I think it was January 2006 and then
2 ended in -- I have my transcripts, but I don't recall.
3 It would have been under my grades which would have
4 been --

5 Q. That's fine. We don't need your exhibits. Do you
6 know how many terms you were at AUA?

7 A. What's that?

8 Q. Do you know how many terms you were at AUA?

9 A. Yeah. I was there -- I'd have to look at my
10 transcripts.

11 Q. Do you know how many semesters you were enrolled in --

12 A. Here it is, student grades. So January -- it looks
13 like January 1st, 2006 and the last would have been
14 clinical rotations up until the end of -- it says on
15 here the date is 12/31/2007.

16 Q. Do you have an independent recollection of the dates
17 you were enrolled at American University in Antigua?

18 A. The exact dates and every day I went to that school, I
19 couldn't tell you the exact dates and what dates I
20 started every semester and what day I ended every
21 semester.

22 Q. I'm not asking you the specific dates, I'm asking you
23 which term you enrolled and which term you left?

24 A. So it would be January 2006 until it looks like the
25 end of 2007, December 2007.

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1 Q. All right. You're reading that off of your
2 transcripts. Do you have --

3 A. I recall the last day that I went there was the last
4 day that I had anything to do with -- I take that
5 back. The last day of the semester would have been
6 December 2007, would have been the last month that I
7 went to that school.

8 Q. Mr. Woodward, if you don't answer questions this is
9 going to take a lot longer.

10 A. I'm trying to answer your question, sir.

11 Q. If you answer questions we could make it --

12 A. I'm trying to answer your questions, sir.

13 Q. This is not going to work if you're talking over me.
14 We've got to -- I ask questions, you answer questions.
15 You answer the questions that are asked. I do not
16 want a long narrative. I want the answer to the
17 question. The question needs an answer.

18 A. And I'm trying to give you a question (sic), sir, and
19 I believe it's my right to use documentation, sir, to
20 answer questions if I don't recall.

21 Q. If you don't recall, that's a fine answer. You can
22 give that as an answer. If you don't have an
23 independent recollection or if you don't remember, you
24 can say that you don't recall.

25 A. And I've been trying to tell you that, I don't recall.

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1 Q. I'm going to show you what I've marked as Exhibit 6.

2 A. Okay.

3 Q. Does this look familiar to you?

4 A. It does.

5 Q. Does it say course guidelines that you received in
6 your education at American University of Antigua?

7 A. Yep.

8 Q. I'm going to represent to you that this is the cover
9 page of a 57-page document. Is it your recollection
10 that this document had multiple pages beyond just this
11 cover page?

12 A. Sure.

13 Q. I want you to look at the upper left-hand corner --

14 A. Sure.

15 Q. -- of this document.

16 Is that the American University of Antigua
17 College of Medicine logo?

18 A. It's at least one of a couple that I know of.

19 Q. Okay. Do you maintain this document on your website?

20 A. Like I said, I don't know that it's there. If it's
21 there, then I don't maintain anything, it's just there
22 on the website and it's there.

23 Q. It's uploaded on --

24 A. If this document -- if Exhibit 5 is accurate and
25 you're saying that it's there, then again, I haven't

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1 looked at this page.

2 Q. I'm not asking you to verify Exhibit 5, I'm asking you
3 to verify Exhibit 6?

4 A. And I'm saying that if this document is on Exhibit 5,
5 as you say, then it's not maintained, it's not --
6 it's -- whatever I received is what I posted.

7 Q. So --

8 A. If that's the case, if I did in case post that, then
9 this document is posted on my website if you're saying
10 that it's posted on my website. If you're saying that
11 it's posted on my website, if it's on my website and
12 it is uploaded and it is this document right here,
13 there's no maintenance involved, it's whatever I
14 received is what I posted.

15 Q. So you've posted it?

16 A. If you're saying that this information is accurate and
17 you hit this hyperlink and it does bring up this
18 document, then I would have posted it.

19 Q. So you don't dispute having posted materials that were
20 originally published by AUA?

21 A. No, no, I don't dispute that. If this is exactly --
22 if this exactly -- this particular document anyway and
23 the syllabus, if that's on my website and it's
24 uploaded on my website, then it's whatever
25 documentation that I received from AUA.

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1 Q. So you've received certain documentation from AUA in
2 the course --

3 A. I purchased documentation for AUA and the
4 documentation that I purchased would have been fifth
5 semester guidelines and the fifth semester syllabus
6 and every other document that I -- and documents that
7 I posted on my website would have come from AUA. Is
8 there maintenance on it? I don't edit it, I don't
9 modify it, I don't critique it. All I do is criticize
10 probably what's in it, and this -- if this is exactly
11 the first cover page of a document that I uploaded
12 from AUA, then that would be a document that I
13 uploaded from AUA.

14 Q. But you have uploaded documents from AUA?

15 A. If you're saying that I uploaded this document and it
16 came from AUA, then I would have --

17 Q. I'm asking -- I'm sorry, I'm asking a more general
18 question. You have on your website uploaded documents
19 that came from AUA?

20 A. I'm saying that I uploaded this document. If you say
21 that I uploaded this document from this page that
22 you're giving me and actually it brings up a document,
23 then I would have received it from AUA.

24 Q. Okay. So the downloads page on your website links to
25 certain documents, yes?

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1 A. Sure.

2 Q. Okay. And if those documents bear the AUA name logo
3 trademark, that is documents that you received from
4 AUA?

5 A. The documents that I uploaded from AUA, just repeat
6 the answer that I've given you. If I uploaded a
7 document from AUA, then I received it from AUA. If it
8 contains their logo, then I downloaded it from their
9 web page or copied it from their web page or put this
10 document of which they gave me on my website.

11 MARKED FOR IDENTIFICATION:

12 DEPOSITION EXHIBIT 7

13 11:56 a.m.

14 BY MR. KITTINGER:

15 Q. I'm going to show you what I've marked as Exhibit 7.

16 A. There's how you spell Hrehorovich right there.

17 Q. Does Exhibit 7 look familiar to you from a --

18 A. It looks familiar.

19 Q. -- brief perusal?

20 A. Correct.

21 Q. What is Exhibit 7?

22 A. Well, according to this cover sheet it says it's a
23 course syllabus, fifth semester, introduction to
24 clinical medicine course syllabus.

25 Q. Is this the syllabus that you received?

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1 MR. WOODWARD: Objection, authentication. I
2 don't know. I mean, I have a copy here. I guess we
3 could sit down and go line by line, but I'm not going
4 to verify it here. If you want to verify it here we
5 can verify it, but I'm not going to say it is. This
6 represents what I received, looks familiar.

7 BY MR. KITTINGER:

8 Q. Do you maintain a course syllabus document on your
9 website?

10 A. I don't maintain anything on my website. If this is a
11 document that I published or that was given to me that
12 I purchased from AUA, then this is a document that --
13 if you're saying that Exhibit 5 is accurate and that
14 that document is actually part of my downloads page,
15 then that would possibly be something that I uploaded
16 on my website.

17 Q. And this has the AUA logo on it?

18 A. According to this it has one of AUA's logos on it.

19 Q. Have you published any PowerPoints that you received
20 from AUA on your website?

21 A. Again, I don't recall. I know that I put in a couple
22 of pages that were from a -- it's either a
23 microbiology or a -- I take that back. There is --
24 yeah. Dr. Victor Hrehorovich's documentation, that's
25 a PowerPoint.

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1 MARKED FOR IDENTIFICATION:

2 DEPOSITION EXHIBIT 8

3 11:58 a.m.

4 BY MR. KITTINGER:

5 Q. I'm going to show you what I've marked as Exhibit .

6 A. Okay.

7 Q. Can you flip through this briefly --

8 A. Yep.

9 Q. -- and tell me if it looks familiar to you?

10 A. Yep, looks familiar.

11 Q. Do you --

12 MR. WOODWARD: Objection, authentication. I
13 mean, I'm not going to verify every single page in
14 this thing. I know that there's multiple pages like I
15 know that on your page 4, step one versus GPA, which
16 shows approximately 50 percent pass rate there
17 according to this graph, it's on page 4 and I believe
18 that the PowerPoint presentation from Dr. Victor
19 Hrehorovich, that would have been slide, I believe,
20 13, so yeah, it could be.

21 Q. So this looks familiar to you?

22 A. Looks familiar.

23 Q. Do you have posted on your website a PowerPoint that
24 is similar to Exhibit 7?

25 A. I would have posted on my website the PowerPoint

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1 presentation that Dr. Victor Hrehorovich distributed
2 to our class.

3 Q. So you have republished documents that you received
4 from Victor Hrehorovich that are in PowerPoint form?

5 A. I have published documentation that Victor Hrehorovich
6 distributed to the class.

7 Q. So you took what he sent you. Did you make any
8 changes or anything?

9 A. No.

10 Q. And you just posted that on your website?

11 A. Yeah.

12 Q. And that's linked on the downloads page of your
13 website?

14 A. Probably, yeah.

15 Q. And that was originally authored by Victor
16 Hrehorovich?

17 A. I don't know who originally authorized it. He's the
18 person that gave the presentation and distributed it.

19 Q. But it was AUA materials?

20 A. According to Victor Hrehorovich. I don't know, it
21 could have been his materials.

22 Q. Can you look at the -- what I assume would be slide 4?

23 A. Okay.

24 Q. At the top of that slide on the first page, is that an
25 American University of Antigua logo that you're

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1 familiar with? Slide 4, I'm sorry.

2 A. Slide 4, okay. It could be American University of
3 Antigua, sure, why not. I don't know. If this says
4 it and this is valid, then whatever he put inside that
5 documentation, if they call that a logo and they have
6 a registered logo in the United States for that
7 document, then okay.

8 Q. Did you have any permission from AUA to post on your
9 website any of the syllabi that you might have on your
10 web page?

11 A. Did I have permission? I did not not have permission.

12 Q. Did you have permission?

13 A. Did I have permission from -- no one from AUA said not
14 to post this on my website.

15 Q. Did you have permission, yes or no?

16 A. No.

17 Q. Did you have permission from AUA to publish any of the
18 course guidelines on your website?

19 A. No.

20 Q. Did you have permission from AUA to publish any of the
21 PowerPoints on your web page?

22 A. No.

23 Q. Did you have any permission from AUA to publish any of
24 its logos on your web page?

25 A. No.

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1 at. I haven't moved that.

2 Q. Can you tell me how many hits your website gets a
3 year?

4 A. Annually, no. I haven't checked the statistics on my
5 website lately. I haven't entered into it because I
6 told the judge that I wouldn't make modifications to
7 the content of my website, so I haven't had any real
8 reason to go out there except to do basic maintenance
9 on it since April. Probably up to now -- again, I
10 haven't checked it in months -- probably I'm going to
11 guess 6,000. I don't know.

12 Q. That's --

13 A. 5,000. I'm going to guess. 5, 6,000, I'm going to
14 guess.

15 Q. That's data that you have access to?

16 A. You should have the same thing. I mean, according to
17 the -- yeah, again, I don't know. It could be 4,000,
18 could be 5,000, I don't know. I don't know how many
19 hits it has. Last night somebody could have -- Japan
20 could have jumped on and said, okay, now we have
21 10,000 hits. I don't know. Neal Simon could sit
22 there and hit it right now and just change my answer
23 right now. I don't know. I don't know how many hits
24 it has.

25 Q. Okay.

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1 A. That's probably part of it, part of another -- I
2 believe the tag that comes up is the truth about
3 American University of Antigua or something to that
4 effect. American University of Antigua is inside the
5 code of my HTML.

6 Q. Have you edited your own HTML tags?

7 A. Sure. I don't recall whatever -- it could be the
8 header is the truth about American -- I don't recall
9 the exact tag that's inside there, and I haven't
10 changed these in almost two years now.

11 MARKED FOR IDENTIFICATION:

12 DEPOSITION EXHIBIT 11

13 1:20 p.m.

14 BY MR. KITTINGER:

15 Q. I'm going to show you what I've marked as Exhibit 11.

16 A. Okay. Yeah, right here, title -- it's the title, the
17 truth about American University of Antigua is the
18 title, and then the key word content, it would be a
19 meta tag, would be key words content American
20 University of Antigua.

21 Q. So American University of Antigua is a --

22 A. That's a key word. It's a word that would be
23 searchable.

24 Q. So your knowledge of how search engines work, they
25 stumble across these tags and index them?

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1 A. Sure.

2 Q. So when someone searches --

3 A. This does not come up though when you type in
4 something like you are asserting. You're asserting
5 that American University of Antigua comes up when
6 somebody searches that. Well, it doesn't. What comes
7 up as viewed on the thing is the truth about American
8 University of Antigua. That's what I was trying to
9 get at.

10 Q. But your key word is American University of Antigua?

11 A. Yeah.

12 Q. Is that a key word you selected?

13 A. Sure.

14 Q. Why would you select that key word?

15 A. Why would I select that key word? Because if you type
16 in American University of Antigua my website would
17 come up on the list in the search engine.

18 Q. Okay. So you selected that key word to indicate that
19 your content was related to American University of
20 Antigua?

21 A. No, no. My content was not part of American
22 University of Antigua. My content is my content, but
23 does the content inside this website have something to
24 do with American University of Antigua, sure. I mean,
25 I'm not asserting that my website is owned by American